

IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

CANON BUSINESS SOLUTIONS, INC.

Plaintiff,

vs.

JOHN JURJEVICH, LEV TAYTS, GREGORY  
ATENCIO, JOANN D. KSENICS and  
KEYSTONE DIGITAL IMAGING, INC.

Defendants.

Civil Action  
No. \_\_\_\_\_

10 12  
**FILED**  
MAR 19 2010  
MICHAEL E. KUNZ, Clerk  
By \_\_\_\_\_ Dep. Clerk

**PLAINTIFF'S MOTION FOR PRELIMINARY INJUNCTION**

Pursuant to Fed. R. Civ. Pro. 65(a), Plaintiff Canon Business Solutions, Inc. hereby moves for a preliminary injunction providing Plaintiff with the following relief:

1. An Order preliminarily enjoining Defendants Jurjevich, Tayts, Atencio and Ksenics (the "Individual Defendants") from providing services for Defendant Keystone Digital Imaging, Inc. ("KDI") in the same geographic territory in which the Individual Defendants worked for Plaintiff.
2. An Order preliminarily enjoining Defendant KDI from employing the Individual Defendants in the geographical area in which they worked for Plaintiff.
3. An Order preliminarily enjoining all Defendants from soliciting any of Plaintiff's customers serviced by any of the Individual Defendants while employed by Plaintiff or any active prospects of the Plaintiff solicited by any of the Individual Defendants.
4. An Order preliminarily enjoining all of the Defendants from soliciting or hiring any current employee of the Plaintiff.
5. An Order preliminarily enjoining any of the Defendants from using or disclosing any of Plaintiff's confidential business information or trade secrets, including but not limited to

Plaintiff's customer list, prospect list, and information pertaining to Plaintiff's customers and prospects, including pricing and leasing information of the Plaintiff.

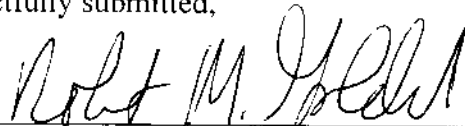
6. An Order directing Defendants to return to Plaintiff any and all documents in their possession which are the property of Plaintiff or which contain or are derived from Plaintiff's confidential information.

As grounds for this Motion, Plaintiff relies upon the facts stated in the Verified Complaint filed herewith, which establish (a) that Plaintiff has a reasonable probability of success on the merits of its claims that (i) the Individual Defendants are engaged in conduct in violation of their employment agreements with Plaintiff, and their obligations under Pennsylvania statutory and common law, (ii) Defendant KDI has tortiously interfered with Plaintiff's contractual relationships with employees and customers and has engaged in unfair competition and misappropriation of trade secrets and (b) that Plaintiff has suffered and continues to suffer irreparable injury and (c) Plaintiff has no adequate remedy at law.

Plaintiff respectfully requests expedited discovery and hearing with respect to this Motion, at which time Plaintiff will provide additional facts in support of this Motion by way testimony, depositions and affidavits.

Plaintiff further relies upon the legal authorities as set forth in the accompanying memorandum of law.

Respectfully submitted,



Robert M. Goldich (25559)  
Kelly Dobbs Bunting (88492)  
GREENBERG TRAURIG LLP  
2700 Two Commerce Square  
2001 Market Street  
Philadelphia, PA 19103  
(215) 988-7883

Attorneys for Plaintiff  
Canon Business Solutions, Inc.

Dated: March 19, 2010